

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS SECURITIES AND ERISA  
LITIGATION

This Document Applies To:

*Starr International U.S.A. Investments LC, et al. v.  
Ernst & Young LLP*

Case No. 1:11-cv-3745-LAK

Civil Action No. 09 MD 2017 (LAK)

ECF CASE

**STARR INTERNATIONAL U.S.A. INVESTMENTS LC'S AND  
C.V. STARR & CO., INC. TRUST'S JOINDER IN MOTION TO PARTIALLY  
LIFT THE DISCOVERY STAY OF THE INDIVIDUAL ACTION PLAINTIFFS<sup>1</sup>**

Plaintiffs Starr International U.S.A. Investments LC and C.V. Starr & Co., Inc. Trust (collectively, "Starr Plaintiffs"), by and through its undersigned counsel, hereby join in the Motion to Partially Lift the Discovery Stay (the "Partial Lift Stay Motion") filed by the Individual Action Plaintiffs [Docket No. 979 in Case 1:09-md-02017-LAK-GWG]. In light of the relatedness of the Starr Plaintiffs' First Amended Complaint [Docket No. 5 in Case 1:11-cv-3745-LAK] to the Individual Action Plaintiffs' Consolidated First Amended Complaint [Docket No. 48 in Case 1:09-cv-06040-LAK] and in an effort to pursue discovery in these cases, the Starr

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<sup>1</sup> Individual Action Plaintiffs refers to the City of Auburn, City of Burbank, Contra Costa Water District, Mary A. Zeeb, Monterey County Treasurer, on Behalf of the Monterey County Investment Pool, City of San Buenaventura, San Mateo County Investment Pool, Vallejo Sanitation and Flood Control District, Zenith Insurance Co., State Compensation Insurance Fund, City of South San Francisco, City of Long Beach, County of Tuolumne, City of Fremont, County of Alameda, City of Cerritos, the California Public Employees' Retirement System, Washington State Investment Board, the State of New Jersey, Department of Treasury, Division of Investment, and American National Insurance Company.

Plaintiffs join in, and incorporate by reference those arguments set forth in the Partial Lift Stay Motion.<sup>2</sup>

WHEREFORE, the Starr Plaintiffs respectfully request that the Court lift the discovery stay for the limited purpose of making available written and documentary discovery already produced to the plaintiffs in *In re Lehman Brothers Equity/Debt Secs. Litig.*, 08 Civ. 5523 (“Class Plaintiffs”) as well as providing the Starr Plaintiffs simultaneous access to additional discovery that occurs between the time of the limited purpose lifting of the stay until the Court rules on the pending motions to dismiss; together with such other and further relief that this Court deems just and proper.

Dated: July 26, 2012

Respectfully submitted,

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<sup>2</sup> Access to previously produced discovery is without prejudice to the Starr Plaintiffs' rights to propound discovery after motions to dismiss have been ruled upon consistent with Pretrial Orders Nos. 1 and 3.